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January 26, 2022

VIA ECF

Honorable Michael A. Shipp, U.S.D.J.
U.S. District Court, District of New Jersey
Clarkson S. Fisher Bldg. & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Vicente Martinez Lopez, et al. v. GDB International, Inc.
Civil Action No. 3:21-cv-05923-MAS-TJB

Dear Judge Shipp:

We represent Defendant GDB International, Inc. in the above-captioned matter. Enclosed is a proposed Consent Order to which the parties have agreed and signed. If this meets with Your Honor's approval, please have this Order entered on the docket.

Thank you for Your Honor's courtesies.

Respectfully submitted,

/s/ *William J. Anthony*

WILLIAM J. ANTHONY

WJA/jll
Enclosure

cc: All Counsel of Record (via ECF)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VICENTE MARTINEZ LOPEZ,
RICARDO GALINDO NAZARIO,
PIGMENIO RUIZ MARTINEZ and
ELEUTERIA ARELLANEZ RAMIREZ,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GDB INTERNATIONAL, INC.,

Defendant.

Civil Action No. 3:21-cv-05923-MAS-TJB

CONSENT ORDER

WHEREAS, on December 23, 2021, named Plaintiffs (hereinafter “Plaintiffs”) filed a Motion for Conditional Collective Class Action Certification (the “Motion”) (Dkt. No. 31);

WHEREAS, on January 3, 2022, Defendant GDB International Inc. (“GDB” or “Defendant”) requested that Plaintiffs’ Motion be adjourned one cycle, from January 18, 2022 to February 7, 2022 (Dkt. No. 35);

WHEREAS, on January 4, 2022, the Court reset deadlines as to Plaintiffs' Motion, with the Motion currently set for February 7, 2022 before Judge Michael A. Shipp;

NOW, THEREFORE, this 26th day of January 2022, Plaintiffs and GDB, by and through counsel, having consented to the entry of this Consent Order ("Order") to address the issues raised in Plaintiffs' Motion, it is hereby ORDERED and DECREED as follows:

1. GDB shall not oppose Plaintiff's Motion or the Proposed Notice of Lawsuit and Opportunity to Join ("Notice"), attached to the Motion as Exhibit A (Dkt. 31-9).
2. An FLSA Collective comprised of all hourly factory workers employed by GDB International Inc. at its Monmouth Junction or New Brunswick recycling facilities from December 23, 2018 through March 19, 2021 is conditionally certified.
3. Plaintiffs agree to use a third-party administrator, to be agreed upon by the Parties, to mail the Notices to potential collective members.
4. Plaintiffs agree that the Notice shall be limited to those individuals employed by GDB as an hourly factory worker at its Monmouth Junction or New Brunswick recycling facilities from December 23, 2018 to March 19, 2021.
5. GDB agrees that within 10 days of entry of this order or selection of the third party administrator, whichever is later, it shall provide the third-party

administrator with the names and contact information for the hourly factory workers employed at its Monmouth Junction and New Brunswick recycling facilities from December 23, 2018 to March 19, 2021, so that the third-party administrator can mail the Notices.

6. Plaintiffs agree GDB is under no obligation to post the Notice at any of its facilities.

CONSENTED TO:

On behalf of Plaintiffs:

/s/ Vivianna A. Morales
Attorney(s) for Plaintiff(s)
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Dated: January 26, 2022

On behalf Defendant GDB International, Inc.

/s/ William J. Anthony
Attorney(s) for Defendant(s)
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Dated: January 26, 2022

APPROVED AND SO ORDERED BY THE COURT.
this ____ day of January, 2022.

MICHAEL A. SHIPP, U.S.D.J.